UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

JOHN G. PEDICINI,

Plaintiff,

v.

Case No. 04-12395-JLT

UNITED STATES OF AMERICA, et al., :

Defendants.

JOINT MOTION TO EXTEND TIME FOR FILING OPPOSITIONS TO MOTIONS IN **LIMINE TO AUGUST 2, 2007**

The parties hereby submit the following joint motion to extend the time for filing their oppositions to motions in limine to August 2, 2007. As reasons therefore, the parties assert the following:

- 1. On July 12, 2007, the Court issued an order, which set out the remaining deadlines for pretrial filings in this action.
- 2. As defense counsel was only assigned to this case in late June 2007, she has had to quickly familiarize herself with the case in order to prepare and oppose the parties' pretrial filings. Consequently, while defense counsel was able to comply with the Court's July 23rd deadline for filing motions in limine, she was not able to file Defendants' Rule 26(a)(3) pretrial disclosures until July 24th.
- 3. As the filing of Defendants' pretrial disclosures was necessary for Plaintiff to be able to determine his grounds, if any, for motions in limine, Plaintiff moved to

- extend the deadline for filing said motions to August 30th.
- 4. On July 25, 2007, defense counsel filed an Amended Motion in Limine to Exclude Plaintiff's Exhibits. As a result, Plaintiff indicated that he would need additional time to file any opposition thereto.
- 5. Similarly, in light of Plaintiff's July 30th extension for filing motions in limine, defense counsel required additional time to oppose Plaintiff's motion because the deadline, as ordered by the Court, would only give her one day (until July 31st) to draft and file oppositions.

WHEREFORE, in light of the above extenuating circumstances, the parties herein request that the Court extend the time for filing oppositions to motions in limine to <u>August 2, 2007</u>.

Respectfully submitted,

FOR THE DEFENDANTS

FOR THE PLAINTIFF

MICHAEL J. SULLIVAN United States Attorney

/s/ Gina Walcott-Torres
Gina Walcott-Torres
Assistant United States Attorney
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3369

/s/ John G. Pedicini John G. Pedicini 10 Milano Drive Saugus, MA 01960 (781) 233-5274